



**Janice Bivens**

08/20/2003 12:12 PM

To: John Cooper/R6/USEPA/US, Courtney Kudla/R6/USEPA/US  
cc:  
Subject: Gulfco - Record of Communication - Allen Daniels, Atty.

To keep you informed.

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----- Forwarded by Janice Bivens/R6/USEPA/US on 08/20/2003 12:12 PM -----

**Garyg Miller**

08/20/2003 11:16 AM

To: Barbara Nann/R6/USEPA/US@EPA, Janice  
Bivens/R6/USEPA/US@EPA  
cc: Gustavo Chavarria/R6/USEPA/US@EPA  
Subject: Record of Communication re: Gulfco - Allen Daniels

I talked with Allen Daniels (713/626-0215) on 8/19/03 and informed him of my upcoming visit to the Gulfco site on 8/22-23/2003. Mr. Daniels is an attorney representing LDL, the current owner of many of the Gulfco tracts. I had previously tried to contact (b) (6) at (b) (6) about the visit, but got a recording that the phone number is not a working number.

Mr. Daniels believed that the contamination originated from the three closed impoundments on Tract 56, which LDL did not own, and he asked what information we had regarding the contamination at the site. I briefly summarized the sampling work that had been done at the site and some of the results. Mr. Daniels also suggested that the site should be limited to Tract 56 only. I responded that the Gulfco property has been listed on the NPL as a Superfund site and that the area of contamination would be determined based on an investigation.

Mr. Daniels stated that Eco-Terra had leased the property for about six to ten months for the purpose of storing crude oil, and spent a lot of money doing clean up work, but then abandoned the site leaving several new tanks (possibly rental tanks) containing fluids that were emptied from other on-site tanks. One of the old tanks still contains chloroform, which Eco-Terra was supposed to empty, but did not.

Mr. Daniels further stated that the Gulfco site had two docks, one with a 500 ton capacity, and the other with a 350 ton capacity, but that the bulkheads were in need of repair.

Mr. Daniels was contacted by a company that wanted to lease the Gulfco site for the purpose of off-loading and transporting materials to the Dow plant. Mr. Daniels understood that this company had a contract with Dow for this purpose.

Mr. Daniels also discussed selling the site to a person from Arkansas, but has not had any further discussions with him.

Mr. Daniels believed that (b) (6) would be available this weekend to give us a tour of the site, and will attempt to contact him to set it up.

Gary Miller

**Janice Bivens**

03/26/2003 09:43 AM

To: Stacey Bennett/R6/USEPA/US@EPA, Carlos  
Sanchez/R6/USEPA/US@EPA  
cc: Barbara Nann/R6/USEPA/US@EPA  
Subject: Gulfco Marine Maintenance Site - LDL Coastal, Inc.

On Tuesday, March 25, 2003, I called Allen B. Daniels, Attorney, Registered Agent for LDL Coastal, Inc., (office phone: 713.626.0215) regarding returned mail from that corporation, as well as another similarly named corporation. I explained to Mr. Daniels that I needed a valid mailing address for the current owner and that I wanted to advise him that EPA staff are planning a site visit sometime around April 9, 2003. Mr. Daniels stated that mail for Mr. Morris Linder, LDL Coastal, Ltd., L.P., and other corporate entities in which Mr. Linder has an interest, should be mailed to his office's address at 1177 West Loop South, Suite 1725, Houston, TX 77027. All returned mail addressed to corporations including the name LDL Coastal were re-mailed via FedEx on March 25, 2003, to Mr. Daniels' office address.

Also, Mr. Daniels inquired about the status of the Gulfco site and about plans the State and EPA may have regarding possible remedial action. I offered a brief explanation of the NPL process, including notification of Potentially Responsible Parties, including an explanation of the General Notice Letters recently mailed. I also provided Mr. Daniels with our email addresses and phone numbers in case he has additional questions.